

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ZION M. VELASQUEZ and RISHMA
ANOOP, on behalf of themselves, FLSA
Collective Plaintiffs, and the Class,

Plaintiffs,

v.

UNIVERSAL PROTECTION SERVICE,
LLC, d/b/a ALLIED UNIVERSAL,

Defendant.

Case No.: 1:24-cv-04795-JLR

**REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF DEFENDANT’S MOTION FOR
PARTIAL DISMISSAL OF PLAINTIFFS’ COMPLAINT**

In support of its concurrently filed Motion for Partial Dismissal of Plaintiffs’ Complaint, Defendant Universal Protection Service, LLC d/b/a/ Allied Universal Security Services (“Allied Universal”), by and through its undersigned attorneys, respectfully requests that this Court take judicial notice of the following pleadings in *Carlton, et al. v. Universal Protection Service, LP*, No. 8:24-cv-751, currently pending in the U.S. District Court for the Central District of California:

- The Original Complaint [Doc. 1], attached hereto as Exhibit 1;
- The Amended Complaint [Doc. 17], attached hereto as Exhibit 2; and
- The Order Granting Transfer of Venue [Doc. 63], attached hereto as Exhibit 3.

Judicial notice is proper under Federal Rule of Evidence 201 because the matters requesting to be judicially noticed are pleadings on file in a United States District Court and, as such, are not subject to reasonable dispute. Allied Universal is submitting these pleadings to demonstrate the fact that they were filed and what is stated within the four corners of the filings. *See HSA Residential Mortg. Servs. of Tex. v. Casuccio*, 350 F. Supp. 3d 352, 361 (E.D.N.Y. 2003) (citing *Kramer v. Time Warner, Inc.*, 937 F.2d 767, 774 (2d Cir. 1991) for the proposition that it is proper for a court to take judicial notice of the pleadings and filings in another lawsuit).

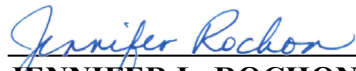
Dated this 9th day of September 2024.

Respectfully submitted,

Plaintiffs shall submit their position on
Defendant's request for judicial notice by
September 13, 2024.

Dated: September 10, 2024
New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge

/s/ Evan S. Weiss

Evan S. Weiss

Robin E. Largent (*pro hac vice* pending)

Robert D. Wilson III (admitted *pro hac vice*)

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ALLIED UNIVERSAL SECURITY SERVICES